

OTC

UNITED STATES DISTRICT COURT

for the  
District of  
Division

5:22-cv-00125

RECEIVED

JAN 13 2022

TONY R. MOORE, CLERK  
WESTERN DISTRICT OF LOUISIANA  
BY SHREVEPORT LOUISIANA

mw

Whitney Brock

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Walden University & Affilates, et al.  
Addtalem Global Education (NYSE : ATGE)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Whitney Brock
Street Address	6129 Yarbrough Road
City and County	Shreveport and Caddo Parish
State and Zip Code	Louisiana 71119
Telephone Number	318-658-5272
E-mail Address	whitneylbrock@yahoo.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	Walden University & Affilates, et al.
Job or Title ( <i>if known</i> )	To Be Determined
Street Address	100 S. Washington Ave Suite 1210
City and County	Minneapolis and Hennepin County
State and Zip Code	Minnesota 55401
Telephone Number	18664925336
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	To Be Determined
Job or Title ( <i>if known</i> )	N/A
Street Address	N/A
City and County	N/A
State and Zip Code	N/A
Telephone Number	N/A
E-mail Address ( <i>if known</i> )	N/A

## Defendant No. 3

Name	To Be Determined
Job or Title ( <i>if known</i> )	To Be Determined
Street Address	N/A
City and County	N/A
State and Zip Code	N/A
Telephone Number	N/A
E-mail Address ( <i>if known</i> )	N/A

## Defendant No. 4

Name	To Be Determined
Job or Title ( <i>if known</i> )	N/A
Street Address	N/A
City and County	N/A
State and Zip Code	N/A
Telephone Number	N/A

E-mail Address *(if known)* N/A**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- ☒ Federal question ☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Americans With Disabilities Act (ADA), Section 504 of the Rehabilitation Act 1973: ADA Title II, Subtitle A, applies to all services, programs, and activities of state, and local governments, Section of the ADA: Title III, applies to Businesses and nonprofit serving the public, Title IX of the Education Amendments of 1972, Non Discrimination- Title IX, Section 504 Americans With Disabilities Act  
Seeking coverage

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Whitney Brock, is a citizen of the  
State of *(name)* Louisiana.

**b. If the plaintiff is a corporation**

The plaintiff, *(name)* N/A, is incorporated  
under the laws of the State of *(name)* N/A,  
and has its principal place of business in the State of *(name)*  
N/A.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**



The defendant, (name) N/A, is a citizen of  
 the State of (name) N/A. Or is a citizen of  
 (foreign nation) N/A.

b. If the defendant is a corporation

The defendant, (name) Walden Universitiy & Afflicates Et, is incorporated under  
 the laws of the State of (name) Minnesota, and has its  
 principal place of business in the State of (name) Minnesota.  
 Or is incorporated under the laws of (foreign nation) To be determined,  
 and has its principal place of business in (name) To be determined.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

I am requesting the amount in controversy of \$2,500,000.00 because of the losses of investment, money and time, delayed time, repair costs, pain and suffering, humiliation, brutal treatments of acts of harassments, intimidation, breach of contracts, hostile threats, manifestation of misconduct, loss of income had me living in poverty from time I should have graduated and been out of poverty.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Walden University violated the rights of the plaintiff (Whitney Brock) when they refused to make reasonable accommodations. Walden University violated the rights of Whitney Brock, as a disabled individual by refusing to accommodate plaintiff (Whitney Brock) and provide her with a just education to become qualified as Master Social Worker. As Walden violated plaintiff (Whitney Brock) the acts of harassment took place, termination of internship took place, failure to accommodate the student, Whitney Brock to provide reasonable accommodation to disabled individual. The plaintiff, (Whitney Brock) has suffered a great amount (losses) of pain and emotional distress from Walden Universities acts of Brutal Harassment, Intimidation, Retaliation, Negligence, Hostile Threatening, Manifestation of Misconduct, and Breach of Contract under the ADA Title XI

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

General Damages, Loss Damages, Compensatory Damages, Special Damages Repair Cost

Loss income & Loss of Earning Capacity: What could have been plaintiff's, Whitney Brock's salary if Walden had not violated plaintiff (Whitney Brock) and her education to enter workforce as Master Social Worker. Plaintiff was disqualified and restricted to gain employment in Social Work without getting her Masters of Social Work to work in entities such as hospitals and out patient behavior clinics to practice requiring Master Social Worker. Most of all plaintiff is requesting all of her losses including and not limiting her salaries because of so much loss time and the amount of funds spent on the program to not get the Master of Social Work degree. The plaintiff has exhausted all of her monies to attend any more postgraduate schools obtain a rightful education in her passion to become a social worker. With all fees and expenses accessed to plaintiff (Whitney Brock) she is unable to afford to pay for another postgraduate university to redo the program because of Walden failure. This not only cost the plaintiff money but time and along with that come more time to be denied of her career. Since the disqualification to the plaintiff Whitney Brock has not been able to gain employment in the clinical social worker entities because it requires a Masters of Social Work degree and a license that come after post graduate completion. I Whitney Brock need all relief from Walden University because of the universities refusal and bias attitude towards plaintiff (Whitney Brock)'s needs based on disability.

**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 01/10/2022

Signature of Plaintiff

Printed Name of Plaintiff

Whitney Brock

**B. For Attorneys**

Date of signing: N/A Right Now



Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Signature of Attorney	NOT APPPLICABLE NOW
Printed Name of Attorney	NOT APPLICABLE NOW
Bar Number	NOT APPLICABLE NOW
Name of Law Firm	NO APPLICABLE NOW
Street Address	NOT APPLICALBE NOW
State and Zip Code	NOT APPLICALBE NOW
Telephone Number	NOT APPLICALBE NOW
E-mail Address	NOT APPLICABLE NOW

RECEIVED *etc*

JAN 13 2022

TONY R. MOORE CLERK  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT LOUISIANA *mw*

I paid Walden  
University, so  
I would like  
to bring my  
complaint forward  
to Walden University *et al*

Please summon  
to appropriate  
overseer in legal  
Dept. of Walden